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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

AMERICAN FEDERATION OF
GOVERNMENT EMPLOYEES, AFL-CIO, *et*
al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as
President of the United States, *et al.*,

Defendants.

Case No. 3:25-cv-03698

**DECLARATION OF KIMBERLY
WORTHINGTON IN SUPPORT OF
PLAINTIFFS' MOTION FOR
TEMPORARY RESTRAINING ORDER
AND PRELIMINARY INJUNCTION**

DECLARATION OF KIMBERLY WORTHINGTON

I, Kimberly Worthington, declare:

1. I am a resident of the City of Chicago in the State of Illinois. I am over the age of 18 and have personal knowledge of all the facts stated herein, except to those matters stated upon information and belief; as to those matters, I believe them to be true. If called as a witness, I could and would testify competently to the matters set forth below.

2. I currently serve as Deputy Commissioner, Bureau of Environmental, Health and Safety Management ("Bureau"), in Chicago's Department of Fleet and Facility Management ("2FM"). I have held this position since January 1, 2012. In my role as Deputy Commissioner at 2FM, I am responsible for protecting human health and the environment as it relates to City-owned property and managing the day-to-day operations and budget for the Bureau.

3. The Bureau at 2FM performs work concerning sustainability planning, brownfield management, waste management, and National Environmental Policy Act reviews, in addition to providing environmental consultations. As part of this work, the Bureau relies on and collaborates with the regional office of the United States Environmental Protection Agency ("EPA") in several ways key to the performance of its mission.

Harms Related to Reorganization of the Environmental Protection Agency

4. For example, the City relies on the Land, Chemicals, and Redevelopment Division of the regional EPA office to provide highly sophisticated knowledge regarding environmental risks and best environmental engineering practices gathered from across the country. 2FM is in frequent contact with the staff to obtain advice regarding risks and best practices when the City is remediating brownfield sites or assisting private developers in redevelopment of brownfields. The City lacks the ability to compile and assess such nationwide information and best practice advice on its own.

5. Similarly, the U.S. General Services Administration ("GSA") announced that on May 30, 2025, it will sunset its Sustainable Facilities ("SF") Tool website. The SF Tool website compiles information about the toxicity, safety, and effectiveness of a wide variety of chemicals and substances used in building and other materials. This information is based on the work and knowledge of EPA scientists, such as those in its Office of Research and Development, which EPA

1 has already cut by 75%, as well as scientists at the Department of Energy and Department of
2 Agriculture.

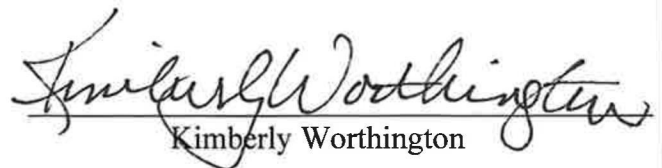
3 6. 2FM relies on the SF Tool website to determine which products the City and its
4 contractors can use for public outdoor areas and buildings that will be safe for both people and the
5 environment. In addition, certain federal grants the City receives requires it and its contractors to
6 follow "green procurement requirements," which mandate the use of specific eco-friendly materials
7 and products for construction and building projects. The SF Tool website provides the up-to-date
8 information necessary for the City to comply with those grant terms.

9 7. Finally, the City relies on the federal workforce at the regional EPA office to respond
10 to emergency and long-term cleanup of toxic sites throughout the City. Both the Superfund and
11 Emergency Management Division and the Land, Chemicals, and Redevelopment Division have
12 provided essential resources to investigate and remediate dozens of abandoned contaminated
13 properties throughout the City. One of those projects is an ongoing program to protect people from
14 radiation exposures to buried radioactive materials beneath the City's rights-of-way and private
15 property, caused by historic contamination by long-defunct and bankrupt companies.

16 8. The cuts to the EPA's workforce, especially those with highly specialized knowledge
17 and expertise, will greatly impact the City's ability to address environmental and public health risks
18 and maintain a safe living environment for all of its residents.

19 I declare under penalty of perjury under the laws of the United States of America that the
20 foregoing is true and correct.

21 Executed on April 29, 2025, at Chicago, Illinois.

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24 Kimberly Worthington
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